



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

October 24, 2018

**VIA EMAIL**

**REQUEST TO BE FILED**  
**UNDER SEAL**

The Honorable Valerie Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 240  
New York, New York 10007

Re: *United States v.* [REDACTED], 18 Cr. 300 (VC)

Dear Judge Caproni:

In preparing for next week's conferences, the Government realized that the scheduled conference set by the Court in this matter on October 29, 2018 at 11:00 a.m. immediately precedes a previously scheduled 11:30 a.m. court conference in the *Guillen* matter, scheduled to take place before Judge Wood that same day.

In the Government's experience, given the separation orders that are in place to ensure [REDACTED] safety, the U.S. Marshals will not be able to produce, transport and hold [REDACTED] in the courthouse on October 29, 2018 under the circumstances. Thus, the Government respectfully requests that the Court re-set the conference for another date and time convenient for the Court. The Government further advises that there are other potential safety concerns with witnesses being produced for court and/or proffers on Wednesday October 31, 2018 and Wednesday, November 7, 2018 to the extent the Court wishes to avoid those dates as well.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney for the  
Southern District of New York

By: \_\_\_\_\_/s/\_\_\_\_\_  
Jessica Fender  
Margaret Graham  
Assistant United States Attorney  
(212) 637-2276 / 2923

